REMARKS

The present application was filed on June 9, 2000 with claims 1-20. Claims 1, 10 and 19 are independent claims. Independent claims 1, 10 and 19 have been amended and claims 5 and 14 have been canceled.

In the outstanding Office Action, the Examiner: (i) rejected claims 1, 8-10 and 17-19 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,793,429 to Kim et al. (hereinafter "Kim"); (ii) rejected claims 2, 3, 6, 7, 11, 12, 15, 16 and 20 under 35 U.S.C. §103(a) as being unpatentable over Kim in view of Hellerstein et al., IEEE, May 1999 (hereinafter "Hellerstein"); and rejected claims 4, 5, 13 and 14 under 35 U.S.C. 103(a) as being unpatentable over Kim, in view of Hellerstein and Hellerstein et al., Conference of the Computer Measurement Group, December 1998 (hereinafter "Hellerstein2").

With regard to the rejection of claims 1, 8-10 and 17-19 under 35 U.S.C. §102(b) as being anticipated by Kim, independent claims 1, 10 and 19 have been amended to recite the step/operation of determining "an optimum combination of sub-models," as was previously recited in dependent claims 5 and 14.

Kim discloses methods of estimating motion in image data. However, Kim fails to disclose the determination of an optimum combination of sub-models to be used in computing on-line predictions, when a change is detected in data associated with the one or more operations for which predictions may be requested.

Further independent claims 1, 10 and 19 recite the computation of one or more predictions using the one or more sub-models "determined to provide an optimum prediction combination." Therefore, the computing operation also specifies an optimum prediction combination. Kim fails to disclose the computation of one or more predictions using the optimum prediction combination of sub-models.

Accordingly, Applicants respectfully assert that independent claims 1, 10 and 19 are patentable over Kim for at least the reasons given above. Further, Applicants respectfully assert that claims 8, 9, 17 and 18 are patentable over Kim not only due to their respective dependence from
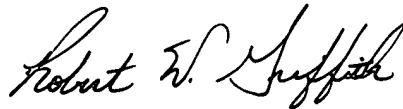
independent claims 1, 10 and 19, but also because such claims respectively recite patentable subject matter in their own right.

Regarding the §103(a) rejection of claims 2, 3, 6, 7, 11, 12, 15, 16 and 20 based on a combination of Kim and Hellerstein, Applicants assert that such dependent claims are patentable not only due to their respective dependence from independent claims 1 and 10, but also because such claims respectively recite patentable subject matter in their own right.

Regarding the §103(a) rejection of claims 4, 5, 13 and 14 based on a combination of Kim, Hellerstein and Hellerstein2, dependent claims 5 and 14 have been canceled. Applicants assert that claims 4 and 13 are patentable not only due to their respective dependence from independent claims 1 and 10, but also because such claims respectively recite patentable subject matter in their own right.

In view of the above, Applicants believe that claims 1-4, 6-13 and 15-20 are in condition for allowance, and respectfully request withdrawal of the §102(b) and §103(a) rejections.

Respectfully submitted,

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